

**Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233**

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

I have many concerns about the new policies and/or procedures being considered by the FCC. Many of these would violate radio stations First Amendment rights to freedom of speech. These changes must not be made.

The proposed advisory boards would require most stations, especially religious broadcasters, to take advice about broadcasting from those that do not share the same values or beliefs of those running the station. While this would have the greatest impact on religious broadcasters it could have adverse affects on all stations. Broadcasters who resist advice from those who don't share their values could face increased harassment, complaints and even loss of license for choosing to follow their own consciences, rather than allowing incompatible viewpoints to shape their programming. The First Amendment prohibits government, including the FCC, from dictating what viewpoints a broadcaster, particularly a religious broadcaster, must present.

Radio stations must not be forced into public access situations where the "public access" views are in direct conflict with the views/values of the station. While I am personally opposed to hearing views that don't agree with mine on radio stations I choose to listen to (KLOVE and KDUV), I also feel strongly that this should not be forced onto any station. I can't imagine the reaction to a "skin head" message being broadcast on a Spanish radio station. But as I understand this proposal, it could happen. The FCC must not turn every radio station into a public forum where anyone and everyone have rights to air time.

Programming reporting requirements will impose an unneeded increase in cost to the daily running of any radio station. I question what purpose this reporting would serve. Many radio stations with nationally syndicated programs would have a hard time meeting some of the reporting requirements. Other than freedom of speech infringements, I can see no benefit to the reporting requirement for the producers of individual programs.

The FCC must not establish a two-tiered renewal system in which certain licensees would be automatically barred from routine renewal application processing. The proposed mandatory special renewal review of certain classes of applicants by the Commissioners themselves would amount to coercion of religious broadcasters. Those who stay true to their consciences and present only the messages they correspond to their beliefs could face long, expensive and potentially ruinous renewal proceedings.

Many broadcasters operate on tight budgets. This includes not only "listener supported" stations, but also smaller market or niche market stations as well. For many stations that transmit from many locations, requiring full time staff on site could force these stations off the air. I don't see how this can be in the public interest. This could also adversely impact many "public radio" stations, forcing these valuable cultural information services off the air.

There are only two radio stations in my area that I find acceptable for my child to listen to. Both of these would be adversely affected by these new proposals. I choose to support one of these stations financially, KLOVE. I feel it would be denying my First Amendment rights to freedom of speech by imposing these policies on any station that I support, financially or prayerfully.

I urge the FCC not to adopt rules, procedures or policies discussed above.

Respectfully,

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